

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

_____	)	
COOPER CAMERON CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 05-188-SLR
	)	
DRIL-QUIP, INC.	)	
	)	
Defendant.	)	
_____	)	

**PLAINTIFF'S UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO EFFECT SERVICE**

Pursuant to Federal Rules of Civil Procedure 4(m) and 6(b), plaintiff, Cooper Cameron Corp. moves for an order, in the form attached hereto, extending the period for service of the summons and complaint upon defendant in this action through and including December 27, 2005. The grounds for this motion are:

1. This action was filed on March 29, 2005. In order to facilitate settlement discussions, the defendant has not been served. Since the filing of the complaint, the parties have been actively discussing settlement of this case. The defendant has requested that plaintiff delay the service of process so that the parties can seek to effectuate a settlement.

2. Rule 4(m) permits 120 days to serve the complaint. By order dated July 29, 2005, that time was extended by 60 days (D.I. 4). Plaintiff believes that an additional 90 days to serve the complaint will allow the parties to further pursue settlement discussions without requiring them to incur the costs and expense of litigation. Counsel for the defendant has advised the plaintiff that it assents to the extension sought.

3. Rules 4(m) and 6(b) provide that the Court, in its discretion, may enlarge the time for cause shown.

MORRIS, NICHOLS, ARSHT & TUNNELL

*/s/ Jack B. Blumenfeld (#1014)*

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September 27, 2005  
476245

**CERTIFICATION**

The subject of the foregoing motion has been discussed with counsel for the defendant, and although counsel has not appeared for the defendant in this action, counsel for defendant has assented to the relief requested.

*/s/ Jack B. Blumenfeld (#1014)*

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Jack B. Blumenfeld

Dated: September 27, 2005